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TRULINCS 05409089 - DYER, TODD A - Unit: LVN-F-F

FROM: 05409089
TO: Blumling, Ryan; Dyer, Todd; Krumdick, Father Mel
SUBJECT: Indemnification Offer
DATE: 04/12/2022 06:25:58 AM

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff

v.

TODD A. DYER,
Defendant

Case No: 19-CV-1319-PP Temporary Restraining Order

NOTICE OF INDEMNIFICATION OFFER AGAINST PURSUIT OF FINANCIAL LOSSES

We wish the record to reflect the following:

Prior to the upcoming Temporary Restraining Order hearing we extend to Mark Borst ("Borst") an indemnification offer in exchange for certain admissions.

As noted, we believe Borst and a select group of previous American Farmland Partners and Midwest Farmland Partners officers, directors, and investors are involved in Racketeering Influenced and Corrupt Organizations (RICO) Act scheme.

Specifically that, the business model, intellectual property and trade secrets Todd Dyer developed for Midwest Farmland Management Corporation and Midwest Farmland Limited Partnership, collectively, Midwest Farmland Partners ("Midwest") were stolen from, or otherwise transferred illegally to American Farmland Partners Corporation and American Farmland Limited Partnership (a name change from Midwest Farmland Limited Partnership), collectively, American Farmland Partners, ("American"), and finally to publicly-traded Farmland Partners, Inc. (FPI: NYSE) and its own affiliated, private, limited partnership, Farmland Partners Operating Partnership, L.P., collectively, Farmland Partners ("FPI") through a number of "buffer" entities in transactions meant to conceal.

The following offer is made to Borst, actionable at any time prior to, or up until the completion of the Temporary Restraining Order hearing:

* Disclose any connections between any previous Midwest Farmland Partner and/or American Farmland Partner based business and any FPI related business including FPI's affiliated, private, limited partnership, Farmland Partners Operating Partnership, L.P. and/or any alleged predecessors and/or "buffer" entity including American Agriculture Corporation and/or Pittman Hough Farms, LLC.

* Disclose the names of those involved and their respective roles.

* Disclose the Government's involvement including the names of US Attorneys, FBI and/or IRS agents, and/or State of Illinois, Secretary of State, Securities Department (ILSOS) employees, and the approximate dates these individuals became aware of the connections between entities.

* Disclose financial returns to date, the number and type of any securities received and held in any FPI related entity, the dates of issuance and sale, and the name, type and number of other securities remaining, if any.

What We Are Offering in Exchange

Should Borst or any other individual involved in the alleged behavior choose to take advantage of our offer, we hereby agree not to pursue any civil litigation and hold harmless that individual for losses attributable to the theft and/or otherwise unauthorized transfer of Dyer's farmland roll-up/consolidation business model to publicly-traded Farmland Partners, Inc. (FPI):

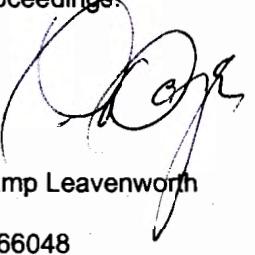
NYSE) and/or its affiliated entities.

Disclosure

Should Borst decline to disclose the continuation of, and ultimate success of the farmland entities, and consequently, the untruthfulness of the Government's allegations, the lack of financial losses, the theft or otherwise unauthorized transfer of Dyer's business model, trade secrets and intellectual property, these continuing efforts to conceal may be used in future civil and/or criminal proceedings.

Submitted,

Todd Dyer
Reg. #05409-089
Federal Prison Camp Leavenworth
P.O. Box 1000
Leavenworth, KS 66048



cc:

R Blumling, Acting, Managing General Partner
Agri Business Investors Limited Partnership

Melvin E. Krumdick, General Partner
Agri Business Investors Limited Partnership

05409-089

Todd Dyer

Reg. # 05409-089

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